

# EXHIBIT 2

To  
**PLAINTIFF NICOLE HARRIS'S MOTION TO COMPEL DISCOVERY  
RESPONSES FROM THE CITY OF CHICAGO**

November 2, 2015

**Case No. 1:14-cv-4391**

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|  |   |                               |
|--|---|-------------------------------|
| NICOLE HARRIS,                           | ) |                               |
|  | ) |                               |
| Plaintiff,                               | ) |                               |
|  | ) |                               |
| v.                                       | ) | Case No. 14-cv-4391           |
|  | ) |                               |
| CITY OF CHICAGO, Chicago Police Officers | ) | District Judge John W. Darrah |
| ROBERT BARTIK, DEMOSTHENES               | ) |                               |
| BALODIMAS, ROBERT CARDARO,               | ) | Magistrate Judge Susan E. Cox |
| JOHN J. DAY, JAMES M. KELLY, MICHAEL     | ) |                               |
| LANDANDO, ANTHONY NORADIN, and           | ) |                               |
| RANDALL WO,                              | ) |                               |
| Defendants.                              | ) |                               |

**NICOLE HARRIS' FIRST SET OF INTERROGATORIES TO  
DEFENDANT CITY OF CHICAGO**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff Nicole Harris requests that Defendant City of Chicago respond to the following Requests for Production within 30 days, or by Monday, September 14, 2015.

**DEFINITIONS AND INSTRUCTIONS**

Nicole Harris incorporates the Definitions and Instructions in her Second Set of Requests for Production to City of Chicago as though fully stated herein.

**INTERROGATORIES**

**INTERROGATORY NO. 1:** The following persons are not sufficiently identified in your Rule 26(a)(1) statement. For each person listed below, please provide a specific description of the subject matters on which he or she may testify, *i.e.*, sufficient enough for Plaintiff to identify with precision the role that the individual played with respect to Ms. Harris's arrest, purported confession, purported investigation into the death of her son, and/or her being charged or convicted for the same.

- (A) Officer Jill Counts
- (B) Officer J. Curry
- (C) Deborah DeSanto
- (D) Officer Patrick Foley
- (E) Officer John Fuller
- (F) Detective Kurt D. Hagemann
- (G) Gina Crumble-Jones
- (H) Officer Robert Konrath
- (I) Thomas Lampa
- (J) Officer Patrick Masuda
- (K) Detective Charity T. Musial
- (L) G. Poradzisz
- (M) Investigator G. Poradzisz
- (N) John Somerville
- (O) Officer Darlene Wujick
- (P) Detective Arthur M. Young

**RESPONSE:**

**INTERROGATORY NO. 2:** Identify with specificity each witness on your Federal Rule of Civil Procedure 26(a)(1) list who may testify that they heard or observed a statement or may testify as to personal knowledge regarding a statement of any kind from any of the following three people on May 14, 15, or until 2:00 a.m. on May 16, 2005. Please provide a separate list for each of the three people listed below, and for each witness you identify, state whether the statement was heard or observed, the date and time such statement was heard or observed, the substance of any statement heard or observed, and the names and contact information of all persons present at the time the statement was heard or observed.

- (A) Nicole Harris;
- (B) Sta-Von Dancy; and
- (C) Dianne Dancy

**RESPONSE:**

**INTERROGATORY NO. 3:** Identify with specificity each witness on your Federal Rule of Civil Procedure 26(a)(1) list who may testify that they observed the demeanor of any of the following three people on May 14, 15, or until 2:00 a.m. on May 16, 2005. Please provide a separate list for each of the three people listed below, and for each witness you identify, state the demeanor of the person observed, the date and time the demeanor was observed, and the names and contact information of all persons present at the time the demeanor was observed.

- (A) Nicole Harris;
- (B) Sta-Von Dancy; and

(C) Diante Dancy

**RESPONSE:**

**INTERROGATORY NO. 4:** Describe with specificity all analyses, reviews, assessments or evaluations of the Chicago Police Department polygraph unit and/or its polygraph examiners from January 1, 2000 to the present, including but not limited to the dates of such analyses, reviews, assessments or evaluations, by whom they were conducted, and the results of each analysis, review, assessment or evaluation.

**RESPONSE:**

**INTERROGATORY NO. 5:** Identify by name, title, address and phone number each person who worked in the Chicago Police Department polygraph unit and each person who directly supervised anyone in the polygraph unit from January 1, 2000 to the present. For any person who conducted polygraph examinations during that time, please place an asterisk next to that person's name.

**RESPONSE:**

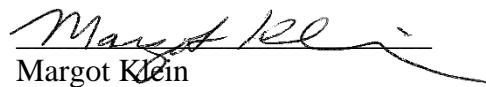
**INTERROGATORY NO. 6:** Identify by name, title, address and phone number each polygraph examiner who was disciplined, the subject of a complaint, or sued for conduct alleged to have been in connection with any aspect of a polygraph examination, including but not limited to pre- and post-examination interrogation or discussion with anyone working in the polygraph unit, from January 1, 2000 to the present.

**RESPONSE:**

**INTERROGATORY NO. 7:** Explain the manner in which witnesses or suspects were assigned to a particular polygraph examiner, including but not limited to any policies that address or relate to any procedure to request a polygraph examination from January 1, 2000 to the present.

**RESPONSE:**

Dated: August 14, 2015

  
Margot Klein  
One of Nicole Harris' Attorneys

Nicole N. Auerbach  
Stuart J. Chanen  
Margot Klein  
Valorem Law Group  
35 E. Wacker Drive, Suite 3000  
Chicago, IL 60601  
(312) 676-5460

Janine L. Hoft  
Joey L. Mogul  
Jan Susler  
People's Law Office  
1180 N. Milwaukee Ave.  
Chicago, IL 60642  
(773) 235-0070

J. Samuel Tenenbaum  
Bluhm Legal Clinic  
Northwestern University School of Law  
357 E. Chicago Ave.  
Chicago, IL 60611  
(312) 503-4808

*Counsel for Plaintiff Nicole Harris*

**CERTIFICATE OF SERVICE**

I, Margot Klein, an attorney, certify that I served a copy of **NICOLE HARRIS' FIRST SET OF INTERROGATORIES TO DEFENDANT CITY OF CHICAGO** on counsel of record by electronic mail and United States Mail on August 14, 2015.

  
Margot Klein  
One of Nicole Harris' Attorneys